

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE:	X	
	X	
ADVANCED SOLIDS CONTROL, LLC	X	CASE NO. 16-52748-RBK
	X	
DEBTOR	X	CHAPTER 11

**MOTION OF ADVANCED SOLIDS CONTROL, LLC FOR AUTHORIZATION TO
SELL PERSONAL PROPERTY FREE AND CLEAR OF ALL LIENS, CLAIMS AND
ENCUMBRANCES**

**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO
YOUR INTERESTS.**

**IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21)
DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED
HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD.**

**A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE
HELD.**

TO THE HONORABLE RONALD B. KING, CHIEF JUDGE,
UNITED STATES BANKRUPTCY COURT:

NOW COMES, Advanced Solids Control, LLC, Debtor-in-Possession in the above styled
and numbered Chapter 11 bankruptcy case, and files this its Motion For Authorization to Sell
Personal Property Free and Clear of All Liens, Claims and Encumbrances, and in support thereof
would respectfully show the Court the following:

1. On December 2, 2016, Advanced Solids Control, LLC (hereinafter called "Debtor") filed its voluntary Petition for Relief under Chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Western District of Texas, San Antonio Division.

2. The asset proposed to be sold is personal property described as a 2010 Ford F-250 Truck, VIN ...4095. The Debtor believes that the 2010 Ford F-250 Truck is worth approximately \$13,000.00; the vehicle is not subject to any liens to creditors.

3. The Debtor proposes to sell the personal property through Enterprise Fleet Management (whom is not related to the Debtor). Enterprise Fleet Management (hereinafter "Enterprise") charges fees in the estimated amount of \$500.00 - \$750.00 to sell the vehicle.

4. Enterprise has previously sold vehicles for the Debtor with success. By having Enterprise sell the vehicle, the Debtor avoids the expense of having to pay someone to drive the vehicle from New Mexico to Corpus Christi, along with the wear and tear on the vehicle.

5. The Debtor believes that the proposed sale of the vehicle will generate a reasonable value based upon the asset proposed to be sold and its marketability.

6. The proceeds from the sale will be used by the Debtor in its reorganization efforts.

7. The Debtor is requesting that the sale of the 2010 Ford F-250 Truck through Enterprise be free and clear of all liens, claims and encumbrances pursuant to §363 of the U.S. Bankruptcy Code.

8. A copy of the Order uploaded with this Motion is attached hereto.

WHEREFORE, PREMISES CONSIDERED, Debtor requests that the Court authorize it to sell free and clear of all liens, claims and encumbrances pursuant to §363 of the U.S. Bankruptcy Code the personal property (2010 Ford F-250 Truck, VIN ...4095) through Enterprise Fleet Management pursuant to the terms set forth above, and for such other and further relief to which the Debtor may show itself entitled.

Date: January 5, 2017.

Respectfully submitted,



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State Bar No. 05565500
LANGLEY & BANACK, INC.
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Attorneys for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2017, a true and correct copy of the above and foregoing instrument was mailed, first class, postage prepaid to the attached notice list.



WILLIAM R. DAVIS, JR.

Label Matrix for local noticing
0542-5
Case 16-52748-rbk
Western District of Texas
San Antonio
Thu Jan 5 08:49:56 CST 2017

Advanced Solids Control, LLC
5655 Bear Lane, Suite 100
Corpus Christi, TX 78405-4407

U.S. BANKRUPTCY COURT
615 E. HOUSTON STREET, ROOM 597
SAN ANTONIO, TX 78205-2055

A-Terry's Plumbing Heating & AC, Inc.
P.O. Box 9714
Midland, TX 79708-9714

A. G. Adjustments, Ltd.
740 Walt Whitman Rd.
Melville, NY 11747-2212

ASK Environmental Equipment
20504 Enfield Ave. N.
Forest Lake, MN 55025-8135

AT&T Mobility
P.O. Box 6463
Carol Stream, IL 60197-6463

American Ad Valorem Tax Consultants
P.O. Box 6330
Corpus Christi, TX 78466-6330

American Medical Group Carlsbad
2410 N. Fowler
Hobbs, NM 88240-2312

Atmos Energy
P.O. Box 790311
St. Louis, MO 63179-0311

Ber Mar Rewind, Ltd.
9609 109 Street Grand Prairie
AB T8V 4E3 Canada

Big Dog - Rig Movers
7500 W. Hwy. 80
Midland, TX 79706-2856

Cain Electrical Supply
P.O. Box 16489
Fort Worth, TX 76162-0489

Carlsbad Irrigation District
5117 Grandi Road
Carlsbad, NM 88220-8931

Chamberlain Enterprises, LLC
205 Raymond St.
Carlsbad, NM 88220-9696

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P.O. Box 1569
Carlsbad, NM 88221-1569

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First Insurance Funding Corp.
P.O. Box 66468
Chicago, IL 60666-0468

First National Bank of Beeville
1400 E. Houston St.
Beeville, TX 78102-5380

Fluid Audience, Inc.
102-10001-101 Avenue Grande Prairie
AB T8V 0X9 Canada

Forrest Tire, Inc.
P.O. Box 1778
Carlsbad, NM 88221-1778

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c/o Robert L. Barrows
Warren, Drugan & Barrows, P.C.
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San Antonio, TX 78215-1517

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San Antonio, TX 78205-1400

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Harvey Fuels, Inc.
P.O. Box 8026
Ruidoso, NM 88355-8026

Industrial Electric Motors, Inc.
P.O. Box 926
Carlsbad, NM 88221-0926

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Kirby-Smith Machinery, Inc.
P.O. Box 270360
Oklahoma City, OK 73137-0360

Komatsu Southwest
P.O. Box 842326
Dallas, TX 75284-2326

LG Pest Control, LLC
2612 Mountain View
Carlsbad, NM 88220-3260

L ayer One Networks, LLC
5705 Gollihar Rd., #1
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2300 N. Main Suite 7
Clovis, NM 88101-3575

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Carlsbad, NM 88220-5669

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Clinton, LA 70722-1069

Prince Parker & Associates, Inc.
P.O. Box 474690
Charlotte, NC 28247-4690

Professional Communications
P.O. Box 61830
Midland, TX 79711-1830

RK Pump & Supply
1400 West County Rd. 30
Midland, TX 79707-7501

Reliant
P.O. Box 650475
Dallas, TX 75265-0475

SLS Litigation Services, LLC
4008 Louetta Rd., Suite 233
Spring, TX 77388-4405

Sentrimax Centrifuges, Inc.
108 Sentry Drive
Wansfield, TX 76063-3608

Southwestern Public Service
dba Xcel Energy
Kimbra Seawright
PO Box 9477
Minneapolis, MN 55484-9477

Stang Automation, Inc.
100 Pointe Marcelle Beaumont
Alberta T4X 0G2 Canada

Systemseven Services
8240 N. MoPac Expwy, #350
Austin, TX 78759-8894

TKH Services
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Carlsbad, NM 88221-3053

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7391 Lincoln Way
Garden Grove, CA 92841-1428

Texas Mutual Insurance Co.
P.O. Box 841843
Dallas, TX 75284-1834

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Schauer & Simank, P.C.
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Corpus Christi, TX 78401-0857

The Water Works
313 South Canal
Carlsbad, NM 88220-5656

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802 N. Carancahua, Suite 1660
Corpus Christi, TX 78401-0030

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1702 N. Collins Blvd., Suite 100
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185 Asylum Street - 03B
Hartford, CT 06103-3408

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Niagara Falls, NY 14304-1745

Williams Scotsman, Inc.
P.O. Box 91975
Chicago, IL 60693-1975

Windstream
P.O. Box 9001908
Louisville, KY 40290-1908

xxxx
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(u)State of New Mexico

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